

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143  
The Honorable Judge Ellis

Motions Hearing: May 7, 2021  
Trial: July 12, 2021

**NOTICE OF INTENT TO RELY ON EXPERT EVIDENCE OF DEFENDANT'S  
MENTAL CONDITION BEARING ON LACK OF GUILT**

The defendant, Zackary Ellis Sanders, by counsel, submits this Notice of Intent to Rely on Expert Evidence of his Mental Condition Bearing on Lack of Guilt, pursuant to Rule 12.2(b) of the Federal Rules of Criminal Procedure. Mr. Sanders intends to rely on such evidence, including through testimony presented by Dr. Tyler Whitney, PSY.D. Dr. Whitney's curriculum vitae was previously provided to the government and this Court. ECF No. 282-1 (Exhibit 1 to Second Supplement to Motion to Continue).

Respectfully submitted,

/s/

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*Counsel for Defendant Zackary Ellis Sanders*

### **CERTIFICATE OF SERVICE**

I hereby certify on this 26<sup>th</sup> day of April, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record.

/s/

Nina J. Ginsberg